



HARRIS CORPORATION

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Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Notice, PS Docket No. 13-87, WT Docket No. 96-86, RM-11433, PS Docket No. 06-229, RM-11577

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1200, et seq., Harris Corporation (Harris) hereby notifies the Federal Communications Commission (Commission) of the following ex parte communication in the above-referenced proceedings.

On June 19, 2013, Dr. Dennis Martinez and Patrick Sullivan, on behalf of Harris, met with David Turetsky, Chief, Public Safety and Homeland Security Bureau, and Gene Fullano, Erika Olsen, and Brian Hurley of the Public Safety and Homeland Security Bureau. The discussion centered on the above-referenced dockets.

Dr. Martinez urged the Commission establish a 3 watt power limit for portable devices, as this policy would create significant benefits in achieving the rural coverage goals of Spectrum Act. Dr. Martinez noted, however, that there is a need to harmonize the power measurement methodologies between the Commission and 3GPP. He noted that 3GPP specifications are based upon device power into the antenna or output port, whereas the Commission bases its power measurements upon effective radiated power (ERP). Dr. Martinez advised that the Commission should specify ERP for deployment limitations and also develop power limitations for equipment authorization. Ideally it would specify a power limitation at the RF port for devices so equipped and TRP (total radiated power) limitation for devices with integrated antennas. Dr. Martinez noted that, recognizing this discrepancy, the Commission has an opportunity to make the parameters of use of high power devices clear by harmonizing these approaches.

Dr. Martinez also noted that another key method of driving NPSBN service to rural areas is to avoid county-level population density thresholds. He discussed that these thresholds limit the ability to maximize coverage in rural areas, and could make rural NPSBN coverage prohibitively expensive.

Finally, Dr. Martinez stated that, based upon the record, that there is broad support for advanced authorization of devices for early build outs. He discussed growing concern that some jurisdictions may be allowed to begin Band 14 operation in the coming weeks, and that there may be no device authorization path at that time. Dr. Martinez urged the Commission to permit equipment with existing authorizations already granted under the provisions of the Commission's Waiver Order¹ and

¹ See NPSBN Service Rules NPRM at ¶ 14. The Commission had established technical requirements for equipment operating in the existing public safety 5 x 5 MHz broadband spectrum, and subsequent equipment certifications were

equipment subsequently certified to be compliant with the Waiver Order technical requirements to be authorized for use on these early adopter networks using the expanded public safety broadband allocation.

Respectfully submitted,

/s/

Patrick Sullivan
Government Relations
Harris Corporation

CC:

David Turetsky
Gene Fullano
Erika Olsen
Brian Hurley

granted to multiple equipment suppliers on that basis. *See* Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks, PS Docket 06-229, Order, 25 FCC Red 5145 (2010) (Waiver Order).